

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : NO. 16-17908  
JUAN P. GARCIA, :  
Debtor : CHAPTER 13

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Debtor, Juan P. Garcia, by and through his counsel, Paul Edward Trainor, filed a Motion to Amend Chapter 13 Plan After Confirmation..

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the relief sought in the Motion to Approve the Modification or if you want the Court to consider your views on the Motion, then on or before April 30, 2019, you or your attorney must do all of the following:

- (a) File an answer explaining your position at:

United States Bankruptcy Court  
For the Eastern District of Pennsylvania  
400 Washington Street, Suite 300  
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) Mail a copy to the movant's attorney:

Paul Edward Trainor, Esquire  
TRAINOR LAW OFFICES, P.C.  
1275 Glenlivet Drive, Suite 100  
Allentown, PA 18106-3107  
(610) 434-7004  
(484) 224-2999 Facsimile  
trainorlawoffice@gmail.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the Hearing, the Court may enter an Order granting the relief requested in the Motion.

**3. A Hearing on the Motion is scheduled to be held before the Honorable Richard E. Fehling on May 2, 2019 at 9:30 a.m., in Courtroom #1, United States Bankruptcy Court, 400 Washington Street, Reading, PA 19601.**

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the Hearing has been cancelled because no one filed an Answer.

April 9, 2019

/s/ Paul Edward Trainor, Esquire  
PAUL EDWARD TRAINOR, ESQUIRE  
I.D. NO. 35627  
Counsel for Debtor  
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